

MICHELLE D. ALARIE, ESQ.  
Nevada Bar No. 11894  
ARMSTRONG TEASDALE LLP  
One Summerlin  
1980 Festival Plaza Drive, Suite 750  
Las Vegas, Nevada 89135  
Telephone: 702.678.5070  
Facsimile: 702.878.9995  
malarie@atllp.com

*Attorneys for Defendant Green Dot Corporation*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

JOHN WAUDBY,

Plaintiff,

vs.

TRANS UNION, LLC; EXPERIAN  
INFORMATION SOLUTIONS, INC.; FIRST  
PREMIER BANK; AND GREEN DOT  
CORPORATION,

Defendants.

Case No.: 2:22-cv-01889-RFB-DJA

**STIPULATION AND ~~[PROPOSED]~~  
ORDER TO EXTEND DEFENDANT  
GREEN DOT CORPORATION'S  
DEADLINE TO RESPOND TO  
COMPLAINT**

**[FIRST REQUEST]**

Defendant Green Dot Corporation ("Green Dot"), by and through its counsel, Armstrong Teasdale LLP, and Plaintiff John Waudby ("Plaintiff"), by and through his counsel, Kind Law and Freedom Law Firm, hereby agree and stipulate, subject to this Court's approval, to extend the deadline for Green Dot to answer or otherwise respond to the Complaint by forty-five (45) days, or from December 5, 2022, to January 19, 2023. This is the first request to extend this particular deadline.

On November 8, 2022, Plaintiff filed a Complaint against Green Dot among others asserting claims for violation of the Fair Credit Reporting Act, 15 U.S.C. § 1681. (ECF No. 1) Plaintiff contends that Green Dot's allegedly misreported his consumer information. (Id.) Green Dot was served with the Summons and Complaint on November 14, 2022. Therefore, Green Dot's deadline to answer or otherwise respond to the Complaint is currently December 5, 2022.

Good cause exists to extend the deadline for Green Dot to respond to the Complaint by forty-five (45) days, or to January 19, 2023. Green Dot is in the process of identifying information and

documents relevant to Plaintiff and the allegations in the lawsuit in order to prepare its response. Green Dot also anticipates that it may need to request additional information from Plaintiff. Notwithstanding its diligence, Green Dot requires more time to investigate Plaintiff's allegations and claims particularly in light of the recent Thanksgiving holiday and the upcoming holidays in December. Plaintiff does not object to a 45-day extension of the response deadline. The parties believe that this first extension will not unduly delay proceedings as this case as it is still in its infancy and no scheduling order is currently in place. This stipulation is entered into in good faith and is not filed for improper purposes.

Accordingly, the parties request that this Court enter and order extending Green Dot's deadline to answer or otherwise respond to the Complaint by forty-five (45) days, or to January 19, 2023.

DATED this 29<sup>th</sup> day of November, 2022.

DATED this 29<sup>th</sup> day of November, 2022.

**KIND LAW**

**ARMSTRONG TEASDALE LLP**

By: /s/ Michael Kind

By: /s/ Michelle D. Alarie

MICHAEL KIND, ESQ.  
Nevada Bar No. 13903  
8860 South Maryland Parkway, Suite 106  
Las Vegas, Nevada 89123

MICHELLE D. ALARIE, ESQ.  
Nevada Bar No. 11894  
One Summerlin  
1980 Festival Plaza Drive, Suite 750  
Las Vegas, Nevada 89135

GEORGE HAINES, ESQ.  
Nevada Bar NO. 9411  
GERARDO AVALOS, ESQ.  
Nevada Bar No. 15171  
FREEDOM LAW FIRM  
8985 S. Eastern Avenue, Suite 350  
Las Vegas, Nevada 89123

*Attorneys for Defendant Green Dot Corporation*

*Attorneys for Plaintiff John Waudby*

**ORDER**

**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE

DATED: 11/30/2022